RILTA ENVIRONMENTAL Ltd. ENVIRONMENTAL MANAGEMENT SYSTEM

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

In accordance with

For inspection of the property of the prop

THE TITE BY TOTAL EVEN	Issue No. 002 Date: May 2006
Environmental Management System Manual	Page 1 of 29

CONTENTS

	i	Contents
	ii	Scope
	iii	Definitions
	iv	Related Documents
ISO 14001 Section	4.1	Environmental Management System Overview
ISO 14001 Section	4.2	Environmental Policy & Commitment
ISO 14001 Section	4.3.3	Planning Environmental Aspects Legal & Other Requirements Objectives & Targets Environmental Management Programme
ISO 14001 Section	4.4.4 4.4.5	Implementation & Operation Structure & Responsibility Training, Awareness & Competence Communication EMS Documentation Document Control Operational Control Emergency Preparedness & Response
ISO 14001 Section	4.5.3	Checking & Corrective Action Monitoring & Measuring Non-conformance & Corrective & Preventative Action Records EMS Audit
ISO 14001 Section	4.6	Management Review

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale
		Name/Position	Operations Director

RILTA Environmental Ltd. ENVIRONMENTAL MANAGEMENT SYSTEM	Issue No. 002 Date: May 2006
Environmental Management System Manual	Page 2 of 29

SCOPE

RILTA Environmental Ltd. is registered at Unit 402, Grants Drive, Greenogue Business Park, Rathcoole, County Dublin. RILTA Environmental operates an integrated waste management facility, combining hydrocarbon waste treatment, drum recycling and hazardous waste/contaminated soil storage. This EMS has been developed for implementation at the Greenogue facility.

The Facility Manager has responsibility for the day to day implementation and maintenance the EMS at the Greenogue facility. The Managing Director has overall responsibility for implementation of the EMS.

The purpose of this manual is to provide the core of RILTA's Environmental Management System (EMS). It summarises the key elements of the EMS and provides a signpost to all related documents and procedures. The EMS has been established and is maintained according to the requirements of EN ISO 14001:2004 as detailed in clause 4 of that standard. This manual is laid out in order to provide ease of cross reference to clause 4.

The Environmental Management System incorporates all departments of the business including Waste Treatment, Drum Recycling, Hazardous Waste Brokerage, Soils Environmental and Cullen Environmental. It details the risks and preventive actions specific to each department to provide for continual improvement for the facility as a whole. As per Clause 4 of the standard, continual improvement is achieved by fully developing, undertaking and auditing all documentation and procedures in the standard, starting from the Environmental Policy right through to the annual Management Reviews:



Continual Improvement

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale
		Name/Position	Operations Director

RILTA Environmental Ltd. ENVIRONMENTAL MANAGEMENT SYSTEM	Issue No. 002 Date: May 2006
Environmental Management System Manual	Page 3 of 29

DEFINTIONS

Environment - The surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.

Environmental Aspect - The element of an organisations' activities, products or services that can interact with the environment. A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.

Environmental Impact - Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisations activities, products or services.

Environmental Management System (EMS) - The part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

Environmental Objective - Overall environmental goal, arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable.

Environmental Policy - Statement by the organisation of its intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives a targets.

Environmental Target - Detailed performance requirement, quantified where practicable, applicable to the organisation or parts thereof, that arise from environmental objectives and that need to be set and met in order to achieve those objectives.

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 4 of 29

RELATED DOCUMENTS

All environmental documentation is included on an index listing held on site by the Facility Manager. Documents of specific importance to this manual are as follows:

RILTA Environmental Waste Management Licence Application

RILTA Environmental Waste management Licence Reg no. 192-1.

ER - 001	Register of Environmental Aspects
ER - 002	Register of Objectives & Targets
ER - 003	Environmental Management Programme
ER - 004	Register of Legislation
ER - 005	Procedures Manual
EOP - 001	Environmental Aspects Environmental Legislation Objectives & Targets Training, Awareness and Competence of the standard of the
EOP - 002	Environmental Legislation
EOP - 003	Objectives & Targets
EOP - 004	Training, Awareness and Competence of the Compet
EOP - 005a	Internal Communication
EOP - 005b	External Communication
EOP - 005c	Control of Suppliers/Contractors
EOP - 005d	Waste Pre-acceptance & Control
EOP - 005e	Waste Pre-acceptance & Control Waste tracking system of the Document Control Operational Control
EOP - 006	Document Control
EOP - 007 a-n	Operational Control
EOP - 008c	Waste Disposal Conserved
EOP - 008d	Sump Inspec
EOP - 009a-e	Emissions Monitoring
EOP - 010	Spillage Procedure
EOP - 011	Bund/Sump/Underground Pipe Testing
EOP - 012	Emergency Preparedness & Response
EOP - 013	Maintenance Programme
EOP - 014	Non-Conformance and Corrective and Preventative Action
EOP - 015	Environmental Records
EOP - 016	Internal EMS Audits
EOP - 017	Management Review

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 5 of 29

ENVIRONMENTAL MANAGEMENT SYSTEM OVERVIEW

RILTA Environmental has established and maintains an Environmental Management System supported by appropriate organisation and procedures as specified in EN ISO 14001:2004.

In establishing this system, the main objectives were:

- to develop an efficient and cost effective Environmental Management System which compliments the EPA Waste Management Licence,
- 2 to implement an EMS by reference to existing procedures and systems,
- to achieve effective environmental risk management for the site, given the increasing amount of existing and future environmental legislation.
- 4 to demonstrate RILTA Environmental's commitment to continual improvement, waste minimisation and pollution prevention,
- to provide a framework for establishing and reviewing site environmental targets and objectives.

The ISO 14001 EMS is based around a simple "Plan, Do, Check, Act" type management system ie.

- 1. Plan what we are going to do
- 2. Do it
- 3. Check that we have done what we planned to do
- 4. Review what we have done and act to improve
- 5. Go back to 1, with improvements in place.

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 6 of 29

ENVIRONMENTAL MANAGEMENT SYSTEM OVERVIEW Contd.

The Environmental Policy Statement, along with the Environmental Aspects, Legal and Other Requirements, Objectives and Targets and the Environmental Management Programme make up the "Plan" part of the system (Sections 4.2 and 4.3 of this manual).

Structure and Responsibility, Training, Awareness and Competence, Communication, Documentation and Document Control, Operational Control and Emergency Preparedness and Response make up the "Do" part of the system.

Monitoring and Measurement, Non-Conformance and Corrective and Preventative Action, Records and the Audit System make up the "Check" part of the system (Section 4.5 of this manual).

Management Review achieves the "Act" part of the system (Section 4.6). This brings the system full circle in the performance of the management system back to planning in a time scale of one year and with resulting continuous improvement.

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 7 of 29

ENVIRONMENTAL POLICY AND COMMITMENT

There is a commitment at the highest management level within RILTA Environmental to ensure the development, establishment and maintenance of this Environmental Management System. This commitment includes provision of the necessary resources to implement the System and sustain improvements.

The Environmental Policy Statement is communicated to all employees and is displayed in the reception foyer of the offices at Greenogue. Copies of the statement (see following page) are available upon request to the public, the media or to any other interested parties.

Consent of convirient owner required for any other use.

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 8 of 29

ENVIRONMENTAL POLICY STATEMENT

RILTA Environmental (formerly SITA Environmental & Pipe & Drain Services) was established in 1978, the company is a market leader in providing environmental services to industrial and commercial clients. RILTA Environmental operates Ireland's largest Hazardous Waste Treatment Facility, EPA Waste Licence No. W192-1. The Facility provides a Hydrocarbon Treatment and Recycling Facility, a Drum Reconditioning and Recycling Facility, a Hazardous Waste Transfer Station, and a Contaminated Soil Transfer Station.

The site provides state of the art facilities for the handling, treatment and recycling of materials from a wide range of industrial sources.

RILTA Environmental operations have a positive environmental impact and help Irish industry to manage and reduce the potential to cause pollution. However, we are aware of the need to effectively manage and control our own emissions and reduce the potential to cause environmental pollution from our site and activities.

Consequently, **RILTA Environmental** regard environmental protection as an ongoing and essential part of our business. We will therefore take all reasonable steps to ensure that our operations do not have any negative impacts on the environment.

RILTA Environmental will strive to meet these commitments by: -

- Conforming to relevant environmental standards, licences and legislation relating to our business,
- Continually improving our operations by setting and reviewing environmental objectives and targets,
- Preventing pollution by monitoring and assessing our activities and emissions,
- * Reducing the quantity of waste disposed of to landfill,
- Improving the quality of the effluent disposed of to sewer,
- Segregating and making wastes available for recycling,
- Communicating our environmental policy to all employees and ensuring that they have the knowledge, resources and authority to implement this policy,
- Ensuring that the proper managerial, technical and administrative controls shall operate in order to enable this policy to be maintained at all levels,
- * Making our environmental policy available to the public and interested parties.

Whilst all **RILTA Environmental** employees have a duty to ensure that our operations do not cause environmental pollution, the overall responsibility for environmental protection lies with the Managing Director.

Signed:	
Ü	Séamus A. Clancy, BE MSc MIEI
	Managing Director
	RILTA Environmental Ltd.
Date:	

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 9 of 29

PLANNING

This section looks at the way RILTA Environmental undertakes the planning stage of the EMS. This has been achieved by first undertaking environmental reviews of the sites and operations. This process allowed RILTA Environmental to identify and understand the environmental aspects of operations, and achieve comprehensive control over legal and other requirements.

Following production of the Register of Environmental Aspects (ER-001) and Register of Legal and Other Requirements (ER-004), according to procedures EOP-001 and 002, RILTA Environmental Ltd were able to establish Objectives & Targets for the site (ER-002) in order to improve the environmental aspects. The environmental management programme (ER-003) outlines the means and timeframes for completing the objectives and targets. The setting up of environmental objectives, targets and management programmes are detailed in procedure EOP-003.

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd. ENVIRONMENTAL MANAGEMENT SYSTEM	Issue No. 002 Date: May 2006
Environmental Management System Manual	Page 10 of 29

ENVIRONMENTAL ASPECTS

Independent Consultants carried out an Environmental Review at RILTA Environmental during April 1998. This review formed the basis of the original waste management licence application to the EPA. A similar review was undertaken in December 2004 on foot of EPA recommendations to reflect the changes involved with moving to the new site at Greenogue.

The review helped to identify the Environmental Aspects of the site, which formed part of the waste licence application. The conditions set down in the waste management licence, together with the compilation of the Aspects Register (ER-001) have been used to set the Objectives and Targets for the site (ER-002). The Aspects Register was compiled in accordance with EOP-001 and the Objectives and Targets Register was compiled in accordance with EOP-003

In compiling the Environmental Aspects Register the following issues were assessed;

- Emissions to air,
- Emissions to sewer.
- Emissions to Ground/Groundwater,
- Waste management,
- Use of raw materials and natural resources
- Nuisances.
- Other local environmental and community issues.

The main Environmental Aspects of RILTA Environmental Ltd's operations are;

- Effluent discharges to sewer,
- Fugitive emissions to air,
- Sludge disposal to landfill,
- Potential ground water contamination,
- Potential discharges to the Griffeen River
- Site bunding and containment,
- Waste acceptance and handling procedures.

The Facility Manager or designee who receives information on potential new aspects as detailed in EOP-001, will keep the Aspects Register for the site up to date. Following twice yearly updates of the EMP, information on reduction of aspects significance will be added to the register.

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd. ENVIRONMENTAL MANAGEMENT SYSTEM	Issue No. 002 Date: May 2006
Environmental Management System Manual	Page 11 of 29

References

ER-001	Register of Environmental Aspects
ER-002	Register of Objectives & Targets
EOP-001	Procedure to Identify Environmental Aspects
EOP-003	Procedure to Set Objectives & Targets

RILTA Environmental Ltd Waste Management Licence Reg. No.192-1



Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 12 of 29

LEGAL AND OTHER REQUIREMENTS

The legal and other requirements relating to the site have been assessed. A list of relevant documents is detailed in the Register of Legislation (ER-004). This register is updated and maintained according to procedure EOP-002.

Key legislative documents are held on site by the Facility Manager. Any changes in legislative requirements, that have an effect on RILTA Environmental Ltd operations, are briefed by the Facility Manager to Management as required.

References

Register of Legislation ER-004

Consent of copyright owner required for any other use. Procedure for Updating Legal Register EOP-002

002 Compiled by: Colm Hussey Issue No. Name/Position Facility Manager Date: May 2006 Reviewed by: Nick Beale, Name/Position Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 13 of 29

OBJECTIVES AND TARGETS

RILTA Environmental have established and will maintain documented environmental objectives and targets (ER-002) which apply to all functions and levels within the organisation. These objectives and targets are based on the information outlined in the Aspects Register and as set out in the waste management licence 192-1

The setting and reviewing of these objectives and targets involves consideration of the site environmental aspects, legal and other requirements (eg. EPA requirements, legislation, waste licence), views of interested parties and technological, financial, operational and business requirements. The procedure for setting and reviewing objectives and targets is outlined in EOP-003.

The site objectives and targets are consistent with RILTA Environmental's commitment to continual improvement of the EMS as outlined in our Environmental Policy Statement i.e. the Register of Objectives & Targets
Procedure for Setting and Review prevention of pollution, waste minimisation etc.

References

ER-002

Procedure for Setting and Reviewing Objectives and Targets EOP-003

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 14 of 29

ENVIRONMENTAL MANAGEMENT PROGRAMME

RILTA Environmental has established and will maintain programmes for achieving the environmental objectives and targets. The programme is detailed in ER-003. The programme includes the designation of responsibility, means and timeframes for achieving each of the objectives and targets.

New developments within RILTA Environmental and external developments affecting the site will be included in the EMP where relevant as detailed in procedures EOP-001 and EOP-003.

References

ER-003 EOP-001 EOP-003	Register of the Environmental Management Program Procedure to Identify Environmental Aspects Procedure to Set and Review Environmental Objectives & Targets
	oog et ally. any or
	ose editor parte edit.
	Procedure to Identify Environmental Aspects Procedure to Set and Review Environmental Appetraction of the Environmental Aspects Procedure to Set and Review Environmental Appetraction of the Environmental Appetraction of the Environmental Aspects Procedure to Set and Review Environmental Appetraction of the Environmental Aspects Procedure to Set and Review Environmental Appetraction of the Environmental Appet
	Conser

Issue No.002Compiled by:
Name/PositionColm Hussey
Facility ManagerDate:May 2006Reviewed by:
Name/PositionNick Beale,
Operations Director

RILTA Environmental Ltd. ENVIRONMENTAL MANAGEMENT SYSTEM	Issue No. 002 Date: May 2006
Environmental Management System Manual	Page 15 of 29

IMPLEMENTATION AND OPERATION

This section looks at the "Do" part of the EMS and defines the structure and responsibility for implementing the EMS. It details the training, awareness and competence which has been established with site personnel and outlines how relevant information on the EMS is communicated.

This section also deals with the control of EMS documentation and procedures to control operations associated with environmental aspects. Procedures to deal with emergency situations are also covered.

Consent of copyright owner required for any other use.

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 16 of 29

STRUCTURE AND RESPONSIBILITY

RILTA Environmental has an established management and organisational structure in place. The organisational chart outlining the management structure of RILTA Environmental is included on page 17 of this manual. Specific roles and responsibilities of key employees regarding the EMS are summarised below.

Managing Director - overall responsibility for the EMS.

Operations Director – responsible for supervising the day-to-day implementation of the EMS.

Facility Manager – overall responsibility for the day-to-day implementation and maintenance of the EMS at Greenogue. Duties include organising sampling and monitoring of emissions in accordance with the waste license, ensuring that site staff is aware of the EMS and ensuring that appropriate environmental responsibilities are incorporated into an individuals job description.

Health & Safety Manager - responsible for overseeing and implementing health and safety issues at the site. Duties include co-ordinating health and safety training throughout the company, monitoring health and safety developments, liasing with Directors, interested parties and regulatory authorities.

Contracts Supervisor - responsible for ensuring that site procedures are correctly followed and implemented. Duties include reporting to the Facility Manager any potential problems which might cause pollution, liasing with the regulatory authorities, assisting the Facility Manager and Directors to implement and maintain the EMS at the site.

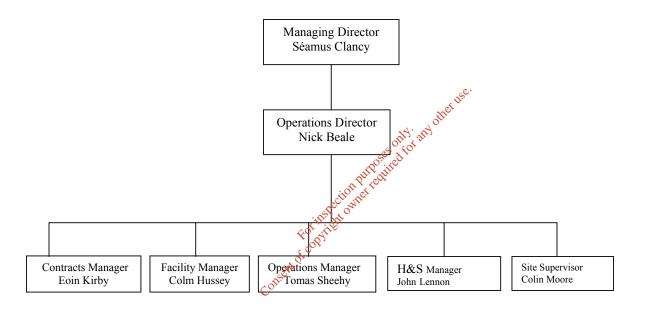
References

EOP 001-017 Management Responsibilities as set out in the Procedures Attached Company Organisational Chart

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 17 of 29

RILTA Environmental Management Structure Chart



Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 18 of 29

TRAINING, AWARENESS AND COMPETENCE

It is the policy of RILTA Environment to identify the training needs and requirements of company personnel. All staff employed at the treatment facility will be given environmental awareness training while performing their duties. The training will be carried out by the facility manager and shall have regard to the specific tasks and the significance of their environmental impacts.

General Awareness Training shall comprise:

- Legal and Licence requirements
- The importance of conformance with the environmental policy, procedures and with the requirements of the EMS.
- The importance of individual roles and responsibilities within the EMS.
- The potential environmental impacts of work activities and the environmental benefits of improved personal performances.
- Improved personal performances.
 The potential consequences of departure from specified operating procedures.

The aim is that all personnel performing tasks, which can cause significant environmental impacts, shall be competent on the basis of education, training and/or experience.

The Operations Director is responsible for the identification and planning of appropriate training for all staff, based on the recommendations of the Facility Manager. The Managing Director has overall responsibility to ensure that the training requirements are met.

A training procedure (EOP 004) has been implemented as part of this EMS. Training records for all relevant RILTA staff are maintained on-site. The Facility Manager maintains an individual Training Record (EFM 001b), a Register of Training Requirements (EFM 001a) and an Annual Training Schedule (EFM 001c) as part of an integrated training matrix. All training records will be kept for the duration of an individual's employment and for a period of not less than three years thereafter.

References

EOP 004	Procedure to identify and implement staff training
EFM 001a	Register of Training Requirements
EFM 001b	Individual Annual Training Record
EFM 001c	Annual Training Schedule

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 19 of 29

COMMUNICATION

RILTA Environmental has implemented procedures (EOP-005a & EOP-005b) to communicate our environmental activities to our internal workforce and externally to interested parties.

Internal communications are facilitated through regular meetings, and the results of environmental monitoring, audits and EMS reviews are passed on to relevant personnel within the Company.

External communications are facilitated through regular reporting to the EPA and through a public information file which is kept by the Facility Manager on site and made available to inspection by the public on request. A copy and record of all reports sent to the EPA is maintained in the operations building by the Facility Manager.

RILTA Environmental is conscious of the need for good internal and external communication in order to motivate the workforce, inform and educate the public and ensure the sustainability of our EMS. RILTA Environmental has stated in our Environmental Policy a commitment to 'have open communication with public authorities and members of the public'.

RILTA Environmental will send questionnaires to suppliers and customers to enquire about their environmental performance and management plans.

References

	afte control of the c
EOP-005a	Procedure for Internal Environmental Communications
EOP-005b	Procedure for External Environmental Communications
EFM-002a	EPA Recurring Reports
EFM-002b	EPA Once-Off Reports
EFM-003	Environmental Complaint/Incident Form
EFM-021a	Non Conformance Report
EFM-021b	Non Conformance Register

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 20 of 29

EMS DOCUMENTATION

This environmental management manual has been written in order to provide a description of the core of RILTA Environmental EMS and the interactions within that system. It is laid out as a 'signpost' to provide direction to other documentation which provides detail as to the running of the environmental management system.

This manual and other environmental documents are available for consultation internally within RILTA Environmental and are held within central files by the Facility Manager.

Other EMS documentation is referenced as follows and is listed in a maintained index held by the Facility manager on site.

Environmental Operating Procedure EOP-*.*

EFM-*.* Environmental Form ER-*.* **Environmental Record**

002 Compiled by: Colm Hussey Issue No. Name/Position Facility Manager May 2006 Reviewed by: Nick Beale, Date: Name/Position **Operations Director**

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 21 of 29

DOCUMENT CONTROL

RILTA Environmental has implemented and will maintain a document control procedure (EOP-006) as part of this EMS. This procedure will ensure that all documents required by the EMS are controlled and reviewed so that:

- 1. They can be located and are available at key locations.
- 2. They are reviewed at least yearly, revised as necessary and approved by authorised personnel.
- 3. They are current. Any obsolete documents will be removed from work areas and assured against unintended use.
- All relevant documentation, particularly environmental records are retained for the 4. appropriate periods.

appropriate periods.

All documents will be legible, dated, identified and maintained in an orderly manner. The Operations Director is responsible for authorizing documents within the EMS unless otherwise specified. The Environmental Operating Procedures (EOP's) shall be authorised by the Facility Manager and the Operations Director.

References

Document Control, Review & Amendment Procedure **EOP 006** Obsolete Master Copy File

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 22 of 29

OPERATIONAL CONTROL

RILTA Environmental has identified operations and activities that are associated with significant environmental aspects (EOP-001, ER-001). Objectives and targets (ER-002) have been set for these aspects and RILTA Environmental Ltd will ensure that such operations and activities shall be carried out in order to reduce significant aspects.

This will be achieved by:

- Establishing and maintaining documented procedures to cover situations where their 1. absence could lead to deviation from the sites policy and objectives and targets.
- 2. Monitoring or verifying outputs from the activity.
- Carrying out corrective action in the event of a breacheof performance or operational 3.

control limits.

The relevant operational controls for each Environmental Aspect (ER-001) are detailed in the Environmental Procedures Manual (ER-005). Authorities References

References

EOP-001	Procedure for Establishing Environmental Aspects
ER-001	Register of Environmental Aspects
ER-002	Register of Environmental Objectives and Targets
ER-005	Procedures Manual

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd. ENVIRONMENTAL MANAGEMENT SYSTEM	Issue No. 002 Date: May 2006
Environmental Management System Manual	Page 23 of 29

EMERGENCY PREPAREDNESS AND RESPONSE

RILTA Environmental has established and will maintain emergency response procedures (EOP-010 & EOP-012).

RILTA Environmental will review and revise, where necessary, the emergency preparedness and response procedures, in particular after the occurrence of an accident or emergency situation.

Testing of emergency procedures shall be undertaken on a regular basis.

Rerferences

Spillage Procedure EOP-010

Consent of copyright owner required for any other use. **Emergency Response Procedure** EOP-012

Issue No. 002 Compiled by: Colm Hussey Name/Position Facility Manager Date: May 2006 Reviewed by: Nick Beale, Name/Position Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 24 of 29

CHECKING AND CORRECTIVE ACTION

This section deals with the 'check' element of the Plan, Do, Check, Act system. Checking is important to assess whether RILTA Environmental is doing what we planed to do, and implement corrective and preventive action where non-conformance's with the plans are occurring. In order to be able to check that plans are being carried out, it is necessary to have established monitoring, measuring and recording schemes. This information will to provide the means to gauge whether RILTA Environmental is achieving the results which we have committed to achieve.

Records shall be kept of all measurements, audits, investigations and corrective actions as well as other records such as training records and external communications.

Internal auditing is a major part of the checking element and is undertaken in order to determine whether the EMS has been properly implemented maintained and conforms to the plans and requirements of EN ISO 14001:2004.

Record keeping and monitoring provides a means to demonstrate sustained improvements and

provide feedback to management regarding the effectiveness

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 25 of 29

MONITORING AND MEASURING

RILTA Environmental has established and will maintain documented procedures to regularly monitor and measure key environmental aspects and licence requirements (EOP-007a to EOP-009e). The results of monitoring and measurement activities will be used to track performance, relevant operational controls and conformance with the site environmental objectives and targets and where relevant, environmental legislation and regulations.

References

EOP 007a	Liquid Waste Acceptance
EOP 007b	Liquid Waste Sampling/Testing/Analysis
EOP 007c	Liquid Waste Handling
EOP 007d	Liquid Waste/Chemical Storage
EOP 007e	Water Treatment
EOP 007f	Treated Effluent Discharge
EOP 007g	Oil Treatment control of the control
EOP 007h	Liquid Waste/Chemical Storage Water Treatment Treated Effluent Discharge Oil Treatment Sludge Treatment Soil Acceptance/Handling & Storage Steel & Plastic Drum Disposal Ink Cartridge Waste Disposal General Waste Disposal Settlement Tank/Interceptor Sump Inspection
EOP 007j	Soil Acceptance/Handling & Storage
EOP 008a	Steel & Plastic Drum Disposal &
EOP 008b	Ink Cartridge Waste Disposat
EOP 008c	General Waste Disposal
EOP 008d	r r
EOP 008e	Ink Sump Inspection
EOP 009a	Air Emissions Monitoring
EOP 009b	Sewer Discharge Monitoring
EOP 009c	Groundwater Monitoring
EOP 009d	Noise Monitoring
EOP 009e	Nuisance Monitoring
EOP 008f	Hazardous Waste Disposal

EFM 004- EFM020c Monitoring Record Forms

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 26 of 29

NON-CONFORMANCE AND CORRECTIVE AND PREVENTATIVE ACTION

RILTA Environmental has established and will maintain a procedure (EOP 014) for implementing corrective and preventive action as part of this EMS.

Corrective and preventive actions taken to eliminate the causes of actual and potential non-conformance's will be appropriate to the magnitude of problems and commensurate with the environmental impact encountered.

Any changes to documented procedures resulting from corrective action shall be implemented and recorded.

References

EOP 014	Non-Conformance & Corrective Action Procedure
EFM 021a	Non-Conformance Report
EFM 021b	Non-Conformance Register of the Non-Conformance Register
	Non-Conformance Report Non-Conformance Register Market and the standard of th
	Ect in perfection purpositives that the constitution of copyright owner feetings.
	chioti net 1
	: 152 Can
	kor vrigit
	, og,
	attor
	المنافع

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 27 of 29

RECORDS

RILTA Environmental has established and will maintain a procedure (EOP-015) for the identification, maintenance, storage and disposition of environmental records as part of our EMS.

All environmental procedures contain the prefix EOP-***

All environmental reports contain the prefix ER-**

All environmental recording forms contain the prefix EFM- **

A number of environmental recording forms eg. incoming liquid waste, waste disposal forms etc are the same as those developed for the existing site management system. These record forms will continue to be used and stored in the EMS files which are held in the site Facility building.

All records will be legible, identifiable and traceable to the activity, product or service. Storage is such that records are readily retrievable and protected against damage, deterioration and loss.

All environmental records shall be kept on site as required by Conditions 10.1 of the EPA waste licence.

Records to be held shall be appropriate to the site EMS, Waste Licence and demonstrate conformance to the requirements of EN ISO 14001.

References

EOP-015	Procedure to Control Environmental Records
ER-***	Environmental Reports
EOP-**	Environmental Operating Procedures
EFM-**	Environmental Recording Form

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
	-	Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 28 of 29

ENVIRONMENTAL AUDITS

RILTA Environmental has established and will maintain a procedure (EOP 016) and programme (EFM 022), for carrying out periodic internal audits of the EMS. This procedure will ensure that internal audits will be carried out to determine the effectiveness of the EMS and to ensure compliance with ISO 14001.

The EMS audit programme and schedule is based on the environmental importance of activities to be audited and on the results of any previous audits. The EMS audit schedule is shown on EFM 022. The internal EMS audit procedure (EOP-016) details the scope, frequency and methodology of audits as well as responsibilities and requirements for conducting audits and reporting results.

Environmental audits will be of two types;

- monthly internal audits of specified parts of the EMS to ensure its effectiveness, 1.
- 2. yearly intensive EMS audit involving external personnel to ensure compliance with

ISO 14001.

This combined approach should ensure the continued improvement of environmental performance and the EMS.

References

Procedure to Set/Conduct Internal EMS Audits EOP 016 Internal EMS Audit Schedule EFM 022 Internal EMS Audit Report EFM 023

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director

RILTA Environmental Ltd.	Issue No. 002
ENVIRONMENTAL MANAGEMENT SYSTEM	Date: May 2006
Environmental Management System Manual	Page 29 of 29

MANAGEMENT REVIEW

RILTA Environmental's senior staff will review the EMS on a yearly basis to ensure its continuing suitability, adequacy and effectiveness (EOP 017). The Operations Director shall ensure the collection of the necessary information to allow the management board to carry out this evaluation.

The review will address any needs for changes to policy, objectives and targets and other elements of the EMS which may have become apparent from audits, changing circumstances at the site and the commitment to continual improvement.

The Managing Director shall have responsibility for advancing specific recommendations for actions to upgrade or modify the EMS following each annual review. The Operations Director will schedule and supervise implementation of any recommendations for upgrading or modifying the EMS.

The review will be documented in the form of minutes of the meeting and the report of the Operations Director.

References

EMS Meeting Agenda
EMS Management Reviewed by Meeting Agenda
EMS Meeting M. EFM 024a EOP 017 EFM 024 EFM 025

Issue No.	002	Compiled by:	Colm Hussey
		Name/Position	Facility Manager
Date:	May 2006	Reviewed by:	Nick Beale,
		Name/Position	Operations Director